## UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

In Re:

Theodore Ansell,

Debtor(s)

KeyBank NA, as S/B/M to First Niagara Bank,

NA.

Movant(s)

v.

Theodore Ansell, and Ronda J. Winnecour,

Trustee

Respondent(s)

Bankruptcy No. 18-20259-GLT

Chapter 13

Related to Claim # 4

## DECLARATION THAT EXISTING CHAPTER 13 PLAN IS SUFFICIENT TO FUND THE PLAN WITH THE MODIFIED DEBT

- 1. KeyBank NA, as S/B/M to First Niagara Bank, NA filed a Notice of Mortgage Payment Change on June 21, 2018.
- 2. Debtor's current escrow account remains unchanged.
- 3. Debtor's principal and interest payment remains unchanged
- 4. Debtor's current total payment is \$150.32 per month.
- 5. Debtor's new total payment is \$147.65 per month.
- 6. Debtor believes and avers that the current confirmed plan is sufficient without the need for amendment as the total payment has decreased.

Date: June 21, 2018 /s/ Corey J. Sacca

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